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VIA ECF

August 30, 2024

Hon. Ronnie Abrams, U.S.D.J.
United States Courthouse
Southern District of New York
40 Foley Square
New York, NY 10007


Application granted. In light of Plaintiff's non-objection to Defendant's motion to stay discovery pending this Court's decision on Defendant's motion to dismiss, the application for the stay of discovery is granted.

The Clerk of Court is respectfully directed to close the motion pending at ECF No. 15.

Re: *Kellie Ann Fuller v. Colgate-Palmolive Company*
Case No. 1:24-CV-04225

SO ORDERED.

Dear Judge Abrams,



Hon. Ronnie Abrams
September 3, 2024

We represent Plaintiff, Kellie Ann Fuller ("Ms. Fuller"), in the above referenced action. Pursuant to your Order dated August 20, 2024, and in response to Defendant's Letter-Motion to Stay Discovery Pursuant to Rule 26(c), Plaintiff states that, out of consideration for the parties' time and resources, she has no objection to staying discovery while Defendant's Motion to Dismiss is pending. However, as articulated in her Response to Defendant's Motion to Dismiss [ECF 17], Plaintiff asserts that only discovery will allow Plaintiff the opportunity to inquire as to the full scope of the problem with Defendant's Fabuloso™ Multi-Purpose Cleaners, specifically as it pertains to the inadequate preservation levels and the bacterial contamination, and should therefore be allowed.

That said, and given the abundant circumstantial evidence of Ms. Fuller's Fabuloso™ use, Plaintiff submits this non-objection to Defendant's motion to stay discovery pending resolution of its Motion to Dismiss.

Respectfully submitted,

JOHNSON BECKER, PLLC

/s/ Adam J. Kress, Esq.
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